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Attorneys for Defendant
BANK OF UTAH, sued solely in its capacity
as Owner Trustee of the N887BA Trust

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION

<p>COMMISSIONS IMPORT EXPORT S.A.,</p> <p>Plaintiff,</p> <p>v.</p> <p>BANK OF UTAH, solely in its capacity as Owner Trustee of the N887BA Trust; EQUATORIAL CONGO AIRLINES, S.A.; and REPUBLIC OF CONGO,</p> <p>Defendants.</p>	<p>DECLARATION OF JAMES W. ANDERSON IN SUPPORT OF BANK OF UTAH'S MOTION TO DISMISS COMPLAINT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(6) AND 12(b)(1)</p> <p>*REDACTED - NONCONFIDENTIAL*</p> <p>(Sealed document filed Jan. 13, 2017; Docket No. 40)</p> <p>Case No. 1:16-CV-00151-BSJ (Judge Bruce S. Jenkins)</p>
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DECLARATION OF JAMES W. ANDERSON

I, James W. Anderson, declare as follows:

1. I am an attorney licensed to practice law in Utah and before this Court. I am a partner in the law firm of Clyde, Snow & Sessions, P.C., the attorneys of record for Defendant Bank of Utah in this action. I know the facts stated here of my own personal knowledge, and, if called to do so, could and would testify competently to them.

2. In six separate tranches delivered between June 15 and November 17, 2016, The Boeing Company (“Boeing”) produced many thousands of pages of documents to Plaintiff in response to a Subpoena and follow-up requests served by Plaintiff in a related action in this Court. On the same days that Boeing produced the documents to Plaintiff, Boeing also delivered to Bank of Utah’s counsel, Robert Barnes, a copy set of all of the produced documents.

3. Exhibits A through K to this Declaration are true and correct copies of certain of these documents produced by Boeing to Plaintiff. The documents each bear Bates numbers placed on the documents by Boeing.

Executed on the 11th day of January, 2017 in Salt Lake City, Utah.

I declare under penalty of perjury under the laws of the State of Utah that the statements set forth above are true and correct.

/s James W. Anderson
James W. Anderson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 25th day of January, 2017, I caused a true and correct copy of the foregoing **DECLARATION OF JAMES W. ANDERSON IN SUPPORT OF BANK OF UTAH'S MOTION TO DISMISS FIRST AMENDED COMPLAINT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(6) AND 12(b)(1) AND MEMORANDUM IN SUPPORT OF MOTION *REDACTED- NONCONFIDENTIAL*** to be filed via the Court's ECF system, which in turn sent copies to counsel of record in accordance with the Court's protocols.

/s/ Jessica Ritchie
Jessica Ritchie

Commission Import Export, S.A. v. Bank of Utah, et al.
Case No. 1:16-cv-151-BSJ
(Bank of Utah/Equatorial Congo Airlines – 321942-1001)

EXHIBITS TO THE DECLARATION OF JAMES E. ANDERSON IN SUPPORT OF
BANK OF UTAH'S MOTION TO DISMISS COMPLAINT

*****REDACTED-NONCONFIDENTIAL*****

EXHIBIT:	BATES NO. RANGE	DOCUMENT	UNDER SEAL INFORMATION
A.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
B.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
C.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
D.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
E.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
F.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
G.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
H.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
I.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
J.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY
K.	UNDER SEAL	UNDER SEAL	ALL DOCUMENT(S) IN THEIR ENTIRETY

EXHIBIT A

(under seal)

EXHIBIT B

(under seal)

EXHIBIT C
(under seal)

EXHIBIT D

(under seal)

EXHIBIT E

(under seal)

EXHIBIT F
(under seal)

EXHIBIT G

(under seal)

EXHIBIT H

(under seal)

EXHIBIT I
(under seal)

EXHIBIT J
(under seal)

EXHIBIT K

(under seal)